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May 31, 2024

Hon. Glenn T. Suddaby, U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, NY 13261-7367

Via ECF

**Re: *Pinnacle Holding Company, LLC, et. al. v. Michael Allen, et al.,
Civil Action No. 5:24-cv-239 (GTS/TWD)***

Dear Judge Suddaby:

Defendants Michael Allen and Pinnacle Employee Services, Inc. (collectively, “Defendants”), by and through their undersigned counsel, seek an extension of time from the Court to answer or otherwise respond to the Complaint filed by Plaintiffs Pinnacle Holding Company, LLC and Pinnacle Employee Services, LLC (collectively, “Plaintiffs”), until June 28, 2024.

Undersigned counsel for Defendants was retained today, May 31, 2024, and filed a Notice of Appearance shortly thereafter. *See* ECF 22. We understand that pursuant to the parties’ Stipulated Order, dated April 10, 2024 (ECF 18), Defendants’ deadline to Answer or otherwise respond to the Complaint is currently set for June 1, 2024. Having been retained today, we require additional time to complete factual investigations prior to answering or otherwise responding to Plaintiffs’ Complaint. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the Complaint and prepare the appropriate response.

On May 31, 2024, shortly after filing a Notice of Appearance in this matter, counsel for Defendants contacted Plaintiffs’ counsels of record, asking if Plaintiffs would consent to an extension of time to answer or otherwise respond to Plaintiffs’ Complaint until June 28, 2024. Counsel for Plaintiffs consented to Defendants’ request for the extension.

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Accordingly, counsel for Defendants seeks leave from the Court for an adjournment of the stipulated June 1, 2024 deadline until June 28, 2024.

We thank the Court for its attention to this matter.

Respectfully submitted,

By: /s/ David D. Lin

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